



**U.S. Department of Justice**  
**United States Attorney**  
**District of Delaware**

*The Hercules Building*  
1313 N. Market Street, Suite 400  
P. O. Box 2046  
Wilmington, Delaware 19899-2046

(302) 573-6277  
FAX (302) 573-6220

May 15, 2019

JP Morgan Chase Bank  
Attn: Subpoena Processing  
National Subpoena Processing Center  
7610 W. Washington St.  
Mail Code IN 1-4054  
Indianapolis, IN 46231-1335

**Re: Grand Jury Subpoena 19-3-LFWS-V-32**

To Whom it May Concern:

Attached is a subpoena duces tecum issued by the Federal Grand Jury requiring the production of certain specified items. The Right to Financial Privacy Act specifically exempts grand jury subpoenas from those provisions of the Act which require notice to a bank customer prior to compliance with a subpoena for production of that customer's records. 12 U.S.C. § 3413(i). Furthermore, you should be aware that 18 U.S.C. § 1510(b)(2) makes it a federal crime for "an officer of a financial institution" to notify either "directly or indirectly . . . (A) a customer of that financial institution whose records are sought by a grand jury subpoena; or (B) any other person named in that subpoena about the existence or contents of that subpoena or information that has been furnished to the grand jury in response to that subpoena[.]"

The return date on the subpoena is for Tuesday, June 25, 2019; however, I would appreciate receiving the responsive documents at your earliest convenience.

In addition, please complete the enclosed Certificate of Authenticity of Business Records upon production of the requested documents. However, you may also substitute this Certificate with one that your company routinely issues when complying with grand jury subpoenas.

Your cooperation in this matter is appreciated and will help safeguard the integrity of the federal grand jury system. If you have any questions regarding this subpoena request, please do not hesitate to contact me at (302) 573-6148, or via email at, [Lesley.Wolf@usdoj.gov](mailto:Lesley.Wolf@usdoj.gov).

Very truly yours,

DAVID C. WEISS  
United States Attorney

BY

*Lesley F. Wolf*  
Lesley F. Wolf

Assistant United States Attorney

Enclosures  
LFW/sir



This form shall be used when requesting financial records of individuals and partnerships of five or fewer individuals under the RFPA.

1 Tracking Number: 19-3-LFWS-V-32	2 Date Order Prepared: May 15, 2019	3 USAO Number: 2019R00000
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Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: JPMorgan Chase Bank, 7610 W. Washington St. Mail Code IN 1-4054, Indianapolis, IN 46231-1335	Funding Certification & Authorization:	A. Budget Official Signature B. Approving Official Signature	Funding Available	Date
5 Deliver Records To: Lesley F. Wolf, AUSA, United States Attorney's Office, 1313 N. Market Street, P.O. Box 2046, Wilmington, DE 19899-2046	Send Completed USA-211 Form & Invoice To:	6 Return Date: Jun 25, 2019		

7 Remarks: Do not proceed with compliance if the total cost will exceed 100.00 without prior approval. To obtain approval, call the requestor listed in Item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment. Please see the attached Important Notice for additional information on invoicing and other requirements for reimbursement.

8 Name of Requestor: Lesley F. Wolf	9 Telephone Number: 302-573-6148	10 Date of request: May 15, 2019
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Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or Set Forth On Your Attached Invoice.

11A Invoice Number:		Quantity	Unit Price		Amount
11B Tax ID Number:			Cost	Per	
11C Service(s)/Records Provided:					
A. Searching and processing costs (clerical or technical personnel)			\$22.00	Hour	
B. Searching and processing costs (management/supervisory personnel)			\$30.00	Hour	
C. Searching and processing costs (computer support specialist)			\$30.00	Hour	
D. Reproduction Costs (Photocopying) - **Note: Copy charges will be disallowed if the information is stored electronically, unless the US Attorney's Office requests paper.			\$0.25	Page	
E. Reproduction Costs (Paper Copies of Microfiche: provide justification)			\$0.25	Frame	
F. Reproduction Costs (Duplicate Microfiche: provide justification)			\$0.30	Microfiche	
G. Storage Media Cost (e.g., Compact Disc, DVD, etc., at Actual Cost)					
H. Transportation Costs (Direct Costs Only)					
In Item #12, pursuant to 18 U.S.C. § 1001, I certify under penalty of perjury that, to the best of my knowledge, the services invoiced above (or in an invoice submitted along with this certification) accurately identify the actual quantities of hours, pages, and microfiche and that any other charges represent the actual costs of the services or goods being invoiced or, if actual costs cannot be identified, the charges represent good faith estimates of the actual or direct costs. I further certify under penalty of perjury that all services invoiced were not performed relative to corporate accounts and pertain only to accounts of individuals or partnerships of five or fewer individuals.					
12 Signature of Financial Institution Official:		13 Date Signed:	Total Amount Claimed By Financial Institution		

Section C - Receiving Report

14 I certify that the articles and services listed were received:	15 Date Received:	16 Disallowance (See Attached)
		17 Net to Financial Institution

18 Right to Financial Privacy Act - Public Law 95-630 (12 U.S.C. 3401-3422) Request Pursuant To: (Check One Only)		19 Signature of Approving Official: _____ Date: _____
SECTION	OBJECT CLASS	20 Funding Source: _____
<input type="checkbox"/> 3404 Customer Authorization	2545	Accounting Code: _____
<input type="checkbox"/> 3405 Administrative Subpoena or Summons	2545	Program: _____
<input type="checkbox"/> 3406 Search Warrant	2545	
<input type="checkbox"/> 3407 Judicial Subpoena	2545	
<input type="checkbox"/> 3408 Formal Written Request	2545	21 Other Accounting/Fund Information:
<input checked="" type="checkbox"/> 3413 Grand Jury Subpoena	2545	Program Code: _____ Project Code: _____



# UNITED STATES DISTRICT COURT

for the  
District of Delaware

NSP

MAY 20 2019

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## SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: 1PMorgan Chase Bank  
Attn: Subpoena Processing  
7610 W. Washington St.  
Mail Code IN 1-4054  
Indianapolis, IN 46231-1335

Grand Jury Subpoena Number  
19-3-LPWS-V-32

**YOU ARE COMMANDED** to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

**Place:** J. Caleb Boggs Federal Building  
Room 3001, 844 King Street  
Wilmington, DE 19801

**Date and Time:**

**Response Due by:** June 25, 2019

You must also bring with you the following documents, electronically stored information, or objects (blank if not applicable):

In lieu of personal appearance, please see Attachment A

<b>RECEIVED BY:</b>	
<input checked="" type="checkbox"/> <b>US MAIL</b>	<input type="checkbox"/> <b>FAX</b>
<input type="checkbox"/> <b>CERTIFIED MAIL</b>	
<input type="checkbox"/> <b>UPS</b>	<input type="checkbox"/> <b>FED EX</b>
<input type="checkbox"/> <b>INTEROFFICE</b>	

**Date:** May 15, 2019



**CLERK OF COURT**

*John A. Lavin*

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

Lesley F. Wolf  
Assistant United States Attorney



**ATTACHMENT A**

JP Morgan Chase Bank  
Attn: Subpoena Processing  
National Subpoena Processing Center  
7610 W. Washington St.  
Mail Code IN 1-4054  
Indianapolis, IN 46231-1335

**PRODUCE THE FOLLOWING:**

All records, documents, and accounts pertaining to all financial/banking transactions with the following known name(s), and/or accounts. However, when conducting your search, please do not limit your scope to only the known account(s) listed below; unknown, associated, signatory, or closed accounts are also requested:

Correspondent Bank	Originator / Beneficiary Account	Originating or Beneficiary Bank
JPMorgan Chase Bank	Account #453365557784 & SBKCHCNBJ300	Bank of China

**Individual Name:**

Robert Hunter Biden  
James Biden  
Devon Archer  
Eric Schwerin

**Business Name:**

Owasco  
Skaneateles  
RSP Holdings  
RSP Investments  
RSTP II Alpha  
RSTP II Bravo  
Seneca Global Advisors  
Aqaba International  
Rosemont Seneca  
Burisma Holdings  
Bohai Harvest RST Shanghai Equity  
Robinson Walker  
Hudson West  
European Energy and Infras Group Limited  
Bladen Enterprises Limited

**For the period 2014 through the present;** these records would include, but not be



either the originator, sending, instructing, or ultimate beneficiary bank account. This would include the complete international wire transfer trail from end to end (originator to beneficiary, and any sending, correspondent, intermediary, receiving, and/or instructing bank in-between).

2. Society for Worldwide Interbank Financial Telecommunication (SWIFT) international financial transaction instruction messages (MT-103) relating to any and all transactions involving the person/company/organization/entity/trust listed above.
3. Book Transfers or Book Entries.

**NOTE:** Provide electronic copies of the requested documents if that is more convenient.

**Contact IRS Special Agent Joseph Ziegler at (216) 407-9614, if you have any questions about the exact scope of documents required by the subpoena. In lieu of personal appearance, prior to the date of the grand jury session records may be emailed to [lesley.wolf@usdoj.gov](mailto:lesley.wolf@usdoj.gov) and [stefania.roca@usdoj.gov](mailto:stefania.roca@usdoj.gov), or mailed to Lesley F. Wolf, Assistant United States Attorney, c/o Stefania Roca, 1313 N. Market Street, Suite 400, P.O. Box 2046, Wilmington, DE 19899-2046.**

**If you need more time to comply with the subpoena or if you intend to personally appear before the Grand Jury, contact Assistant United States Attorney Lesley F. Wolf at 302-573-6148.**

**\*Do not disclose the existence of this subpoena to the individual or any third party.\***

*Please reference grand jury subpoena 19-3-LFWS-V-32 in your response.*



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Re: Grand Jury Investigation

Grand Jury Subpoena No. 19-3-LFWS-V-32

**CERTIFICATE OF AUTHENTICITY  
OF BUSINESS RECORDS**

I, \_\_\_\_\_, attest that:

I am employed by \_\_\_\_\_,

my official title is \_\_\_\_\_ and

I have been appointed the keeper of the attached records.

Each of the attached records is the original or duplicate of the original records in the custody of JPMorgan Chase Bank.

I further state that:

- A) These records were made at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;
- B) These records were kept in the course of a regularly conducted business activity; and,
- C) It was the regular practice of this business to make such records.

I certify that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on \_\_\_\_\_

Date

Signature